

TRUCK TALK

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Recordkeeping and CSA

Recordkeeping and CSA – if it's not DOCUMENTED it didn't happen!

In the world of CSA, there have been many changes – some subtle and others not so much. But, the bottom line is that all motor carriers must keep up with these changes in addition to abiding by them. In many cases, the changes are easier to keep up with because of the trucking media commitment to the fact that any of these changes are in fact news – and should be reported. Let's take a few moments to view one of the CSA BASICS and how recordkeeping and DOCUMENTATION of any training can be vital in dealing with DOT interventions and their consequences.

At this point, most carriers know how and where to access the online information about their on-highway compliance through the Safety Measurement System (SMS). Here is their web address, in case you might have forgotten: <http://ai.fmcsa.dot.gov/SMS/> Scrolling from the top, the Unsafe Driving BASIC is at the top of the list. This BASIC involves violations such as speeding (and there's a sliding scale – the faster speeds carry higher Severity Weights than lesser infractions) along with other traffic violations, such as seat belt usage.

Should a company face an intervention involving the Unsafe Driving BASIC, there are a number of different RECORDS which may be requested as a part of the investigation, including driver training certificates (for courses that may have been offered to drivers, including defensive driving and other such educational opportunities) and safety meeting attendance sign in sheets. In addition, receipts for company handbooks/policies would provide excellent documentation of your support of the FMCSR through the implementation of company policies which require compliance on a general basis in addition to specific hot button topics such as a cell phone policy (which embraces the FMCSA ban on the use of hand held devices and text messaging), and a policy relating to the speed of the vehicles and how they are to be operated.

To sum this all up – as far as the Unsafe Driving BASIC is concerned, recordkeeping, training and policies that are in place are important. However, DOCUMENTING any training and the receipt of the policies proves, through driver signature, that this occurred and that the driver is aware of the policies. Historically carriers have not been sanctioned and fined for too much documentation but many have been fined for too little documentation. Now is as good of a time as any to assess how your company would be viewed under these circumstances. As you know, when dealing with the DOT, if it isn't written down, it didn't happen.

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